REMARKS

Favorable reconsideration of this application, in light of the following discussion, is respectfully requested. Claims 15-62 remain pending in the present application.

By way of summary, the Office Action presented the following issues: Claims 15-18, 20-23, 26-29, 34-44, 46-49, and 52-62 were rejected under 35 U.S.C. § 103(a) as obvious over U.S. Patent Application Publ'n No. 2004/0160630 to Iriyama et al. (hereinafter "Iriyama") in view of U.S. Patent Application Publ'n No. 2003/0011633 to Conley et al. (hereinafter "Conley") and U.S. Patent Application Publ'n No. 2002/0138567 to Ogawa (hereinafter "Ogawa"); Claims 19, 24-25, 45, and 50-51 were rejected under 35 U.S.C. § 103(a) as obvious over Iriyama, Conley, Ogawa, and U.S. Patent Application Publ'n No. 2004/0193717 to Tajima et al. (hereinafter "Tajima"); and Claims 30-33 were rejected under 35 U.S.C. § 103(a) as obvious over Iriyama, Conley, Ogawa, and U.S. Patent Application Publ'n No. 2004/0239975 to Kawaura et al. (hereinafter "Kawaura").

Claims 15-18, 20-23, 26-29, 34-44, 46-49, and 52-62 were rejected under 35 U.S.C. § 103(a) as obvious over Iriyama in view of Conley and Ogawa. Because a *prima facie* case of obviousness of the features of independent Claims 15, 34, 38, 40-41, 56, 60, and 62, has not been established, Applicants respectfully traverse that rejection.

Independent Claim 15 is directed to a system including, in part,

> an image handling apparatus; and

> an external processing apparatus . . . , the external processing apparatus sending a screen update instruction request to the image handling apparatus in response to a message informing an end of the image handling process, wherein

> the image handling apparatus comprises . . .

>> an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the external processing apparatus to update a graphical interface.

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Iriyama, Conley, and Ogawa fail to disclose or suggest those features.

Iriyama concerns an image printing system. The Office Action admitted, "Iriyama does not specifically disclose the external processing apparatus sending a screen update instruction request to the image handling apparatus in response to a message informing an end of the image handling process, and an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the external processing apparatus to update a graphical interface."[1]

Conley concerns communication between an internal copier computer and an external network computer in which a user "selects a 'Scan Button' on the UI . . . , and corresponding XML data is sent . . . to the remote network computer PC indicating such user selection of a 'Scan Button' . . . ."[2] Further to Conley, "the network computer PC receives this XML data . . . and creates XML Data . . . which is sent . . . back to the MFP copier to initiate scanning thereat and also to describe the UI at the display TP . . . ."[3]

That is, Conley merely describes sending XML data to initiate a scanning and to describe a UI, if XML data indicating a scan button is received. The Office conceded, "Neither Conley nor Iriyama disclose updating a user interface in response to an end of process message."[4]

Conley does not disclose or suggest the features of "the external processing apparatus sending a screen update instruction request to the image handling apparatus in response to a message informing an end of the image handling process," and "an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the external processing apparatus to update a graphical interface," as recited in Claim 15.

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[1] Office Action at 3.
[2] Conley, para. [0038].
[3] Id.
[4] Office Action at 4.

Ogawa concerns "An update client [that] sends to an update server . . . , identification information of a driver and firmware which are included in a disk array system, and identification information of an error event which has occurred in the disk array system."[5] According to Ogawa, "the update server sends to the update client, update data corresponding to the combination of the supplied identification information of the driver, the firmware, and the error event."[6] Further to Ogawa, "The update client updates both of the driver and the firmware using the supplied update data."[7]

That is, Ogawa merely describes updating a driver and firmware of a disk array system. Ogawa does not disclose or suggest updating a graphical interface.

Further, the Office Action asserted that Ogawa describes "sending an error message" and, therefore, that Ogawa describes an "end of process message."[8] Without conceding the propriety of those assertions, Applicants note that Claim 15 requires a screen update instruction request sent in response to the message, as well as a request to update a graphical interface sent when the screen update instruction request is received. The Office Action implies that the update data describes the screen update instruction request.[9] The Office Action fails to identify a request to update a graphical interface sent when the screen update instruction request is received.

Ogawa does not disclose or suggest "an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the external processing apparatus to update a graphical interface," as recited in Claim 15.

Further, the Office Action appears to take the position that updating a graphical interface is equivalent to updating a driver and firmware of a disk array. The Office is

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[5] Ogawa, Abstract.
[6] Id.
[7] Id.
[8] Office Action at 4.
[9] Id. ("Ogawa, however, discloses sending an error message . . . and receiving an update in response to the error message . . . .")

reminded, "In order to rely on equivalence as a rationale supporting an obviousness rejection, the equivalency must be recognized in the prior art . . . ."[10] Should the Office wish to advance the position that updating a graphical interface is equivalent to updating a driver and firmware of a disk array, Applicants respectfully request evidence recognizing the advanced equivalency.

Further, although Ogawa generally describes an updating performed if update data is sent, Ogawa does not disclose or suggest updating a graphical interface specifically. In this regard, the Office is reminded, "The fact that a claimed species or subgenus is encompassed by a prior art genus is not sufficient by itself to establish a *prima facie* case of obviousness."[11]

The MPEP instructs,

Office personnel should make findings as to:

(A) the structure of the disclosed prior art genus and that of any expressly described species or subgenus within the genus;

(B) any . . . utilities disclosed for the genus, as well as any suggested limitations on the usefulness of the genus, and any problems alleged to be addressed by the genus;

(C) the predictability of the technology; and

(D) the number of species encompassed by the genus taking into consideration all of the variables possible.[12]

Should the Office wish to advance the position that the Ogawa updating renders obvious updating a graphical interface, as claimed, Applicants request that the next Office Action make findings pursuant to the MPEP.

Ogawa does not disclose or suggest the feature of "an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the

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[10] MPEP § 2144.06.
[11] MPEP § 2144.08 II; In re Baird, 16 F.3d 380, 382 (Fed. Cir. 1994).
[12] MPEP § 2144.08 II A 1.

external processing apparatus to update a graphical interface," as recited in independent Claim 15.

Iriyama, Conley, and Ogawa, taken alone or in combination, fail to disclose or suggest the advantageous combination of "the external processing apparatus sending a screen update instruction request to the image handling apparatus in response to a message informing an end of the image handling process," and "an interface that, when the image handling apparatus receives the screen update instruction request, sends a request to the external processing apparatus to update a graphical interface," as recited in Claim 15.

It is submitted for at least the foregoing reasons that independent Claim 15 (and all associated dependent claims) patentably distinguishes over any proper combination of Iriyama, Conley, and Ogawa.

It is further submitted that independent Claims 34, 38, 40-41, 56, 60, and 62 (and all associated dependent claims) patentably distinguish over any proper combination of Iriyama, Conley, and Ogawa for at least reasons analogous to those set forth above with regard to Claim 15.

It is additionally submitted that Tajima and Kawaura fail to remedy the above-noted deficiencies in Iriyama, Conley, and Ogawa. Accordingly, it is submitted that the rejections of dependent Claims 19, 24-25, 30-33, 45, and 50-51 are moot.

Consequently, in light of the foregoing comments, it is respectfully submitted that the

present application is patentably distinguished over the applied references. The application is

therefore in condition for allowance, and an early and favorable action to that effect is
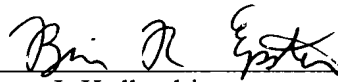
respectfully requested.

Respectfully submitted,

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